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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CITY OF STOCKTON,

Plaintiff,

vs.

BANK OF AMERICA, N.A;
BANK OF AMERICA SECURITIES, LLC;
BEAR, STEARNS & CO.; UBS AG;
JP MORGAN CHASE & CO;
LEHMAN BROTHERS INC.;
MERRILL LYNCH & CO., INC.;
MORGAN STANLEY;
PIPER JAFFRAY & CO.;

) Case No.: CV-08-4060 MMC
)
) **STIPULATION AND [PROPOSED]**
) **ORDER EXTENDING ALL**
) **DEFENDANTS' TIME TO**
) **RESPOND TO THE COMPLAINT**
)
) **AND ORDER CONTINUING CASE**
) **MANAGEMENT CONFERENCE**
)
)
)
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1 WACHOVIA BANK, N.A.;)
 2 CITIGROUP, INC.; AIG FINANCIAL)
 3 PRODUCTS CORP.; AIG SUNAMERICA)
 4 LIFE ASSURANCE CO., INC.;)
 5 FINANCIAL SECURITY ASSURANCE)
 6 HOLDINGS, LTD., FINANCIAL)
 7 SECURITY ASSURANCE, INC.;)
 8 FINANCIAL GUARANTY INSURANCE)
 9 COMPANY; AMBAC FINANCIAL GROUP,)
 10 INC.; MBIA, INC.; RABOBANK GROUP;)
 11 SALOMON SMITH BARNEY INC.;)
 12 NATIONAL WESTMINSTER BANK, PLC;)
 13 GE FUNDING CAPITAL MARKET)
 14 SERVICES, INC.; TRINITY FUNDING CO.,)
 15 LLC; GENWORTH FINANCIAL, INC.¹;)
 16 SECURITY CAPITAL ASSURANCE INC.;)
 17 NATIXIS, S.A.; SOCIÉTÉ GÉNÉRALE)
 18 S.A.; XL ASSET FUNDING, LLC;)
 19 XL LIFE INSURANCE & ANNUITY)
 20 COMPANY; CDR FINANCIAL)
 21 PRODUCTS; FELD WINTERS)
 22 FINANCIAL LLC; WINTERS & CO.)
 23 ADVISORS, LLC; CAIN BROTHERS &)
 24 CO, LLC; NATIXIS FUNDING CORP.;)
 25 GEORGE K. BAUM & CO.;)
 26 KINSELL NEWCOMB & DE DIOS INC.;)
 27 SOUND CAPITAL MANAGEMENT, INC.;)
 28 INVESTMENT MANAGEMENT)
 ADVISORY GROUP, INC.;)
 FIRST SOUTHWEST COMPANY;)
 PACKERKISS SECURITIES;)
 MORGAN KEEGAN & CO., LTD.;)
 and)
 DOES 1 – 50.)
 Defendants.)

¹ By agreement of the parties, Genworth Financial, Inc. has been dismissed without prejudice and Genworth Financial Investment Management, LLC has been served as DOE 1.

Pursuant to Local Rules 6-2 and 7-12, Plaintiff CITY OF STOCKTON ("Plaintiff") and Defendant UBS AG, on behalf of itself and all defendants to this action (collectively "Defendants"), hereby stipulate that Defendants' time to respond to the Complaint is extended up to and including December 15, 2008. The parties further stipulate that, with the approval of the Court, the Case Management Conference set by this Court for December 5, 2008 shall take place on January 30, 2009, or as soon thereafter as may be practicable. The parties' joint case management statement shall be submitted not less than seven days before the conference.

As set forth in the attached Declaration of Scott A. Westrich, the parties request these extensions to place Defendants' responses on a common schedule with a related action and to allow Defendants sufficient time to respond given the complexity of the allegations. Defendants removed a similar action, *County of San Diego v. Bank of America, N.A., et al.*, No. CV 08-06283 FMC (C.D. Cal.), on September 24, 2008. The parties have stipulated that responses in that action must be filed on or before December 15, 2008. The requested extension postpones proceedings in this case by less than 60 days. Only one prior time modification has been requested.

This stipulation is made without prejudice to any defense of Defendant UBS AG or any other defendant.

Dated: October 21, 2008

By: 

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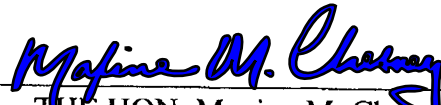
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PURSUANT TO STIPULATION, IT IS SO ORDERED; the Case Management Conference is continued from December 5, 2008 to January 30, 2009, at 10:30 a.m. A Joint Case Management Statement shall be filed no later than January 23, 2009.

DATED: October 27, 2008


THE HON. Maxine M. Chesney
United States District Judge